

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

BRIAN F. LEONARD, Individually
and derivatively on behalf of
CHESAPEAKE ENERGY
CORPORATION,

Plaintiffs,

vs.

AUBREY K. McCLENDON,
RICHARD K. DAVIDSON,
KATHLEEN M. EISBRENNER,
V. BURNS HARGIS,
FRANK KEATING,
CHARLES T. MAXWELL,
MERRILL A. MILLER, JR.,
DON L. NICKLES, and
LOUIS SIMPSON,

Defendants,

--and--

CHESAPEAKE ENERGY
CORPORATION, an Oklahoma
Corporation,

Nominal Defendant.

CASE NO. CIV-12-479-M

JOINT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

WHEREAS, on April 30, 2012, Plaintiff Brian F. Leonard filed his Shareholder Direct and Derivative Complaint (the "Complaint") in the above-referenced matter;

WHEREAS, Plaintiff is in the process of completing service of the

Complaint on the Nominal Defendant and Individual Defendants (collectively "Defendants");

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A) the first response to the Complaint, by Defendant(s) served on May 1, 2012, was due on May 20, 2012;

WHEREAS, the parties have agreed to extend the time of all Defendants to respond to the Complaint until after the consolidated amended complaint is on file.

WHEREAS, counsel for the Defendants has agreed to accept service of the Complaint for all Defendants;

NOW THEREFORE, IT IS STIPULATED AND AGREED by Plaintiff and Defendants, by and through their respective counsel that Defendants should be allowed to file their response to the Complaint thirty (30) days from the date of filing of the Consolidated Amended Complaint.

RELIEF REQUESTED

The parties request Defendants be given thirty (30) days from the date of filing of the Consolidated Amended Complaint in which to file a coordinated response to the Complaint.

Respectfully submitted this 22nd day of May, 2012.

s/ Kenyatta R. Bethea

Kenyatta R. Bethea OBA #18650

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